

Hearing Date: April 20, 2022 at 10:00 a.m.

Objection Date: March 15, 2022

Reply Date: March 31, 2022

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: FAIRFIELD SENTRY LTD., <i>et al.</i> , Debtors in Foreign Proceedings.	Chapter 15 Case Case No. 10-13164 (CGM) Jointly Administered
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), <i>et al.</i> , Plaintiffs, v. THEODOOR GGC AMSTERDAM, <i>et al.</i> , Defendants.	Adv. Pro. No. 10-03496 (CGM) Administratively Consolidated ORAL ARGUMENT REQUESTED
This Notice of Motion to Dismiss is Related to the Following Adversary Proceedings: 10-03635 10-03636	

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon Falcon Private Bank's Memorandum of Law in Support of its Motion to Dismiss for Lack of Personal Jurisdiction, filed contemporaneously herewith, Defendant Falcon Private Bank ("Falcon") will move this Court for an order dismissing with prejudice (a) the Plaintiffs' Fifth Amended Complaint, dated August 11, 2021, in Adversary Proceeding Number 10-03635 [Docket No. 620], and (b) the Plaintiffs' Fifth Amended Complaint, dated August 11, 2021 in Adversary Proceeding Number 10-03636 [Docket No. 679], pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Falcon does not consent to the entry of final orders or judgment by this Court.

Dated: November 5, 2021
New York, NY

Respectfully Submitted,

PILLSBURY WINTHROP SHAW
PITTMAN LLP

By: /s/ Eric Fishman

Eric Fishman
Andrew Troop
Rahman Connelly
31 West 52nd Street
New York, NY 10019
(212) 858-1000 (phone)
(212) 858-1500 (fax)
eric.fishman@pillsburylaw.com
andrew.troop@pillsburylaw.com
rahman.connelly@pillsburylaw.com

Counsel for Falcon Private Bank